My name is Dr. Richard Cowles. I am an entomologist, and I work for the Connecticut Agricultural Experiment Station. I come to you not as a representative of the Station, but as a private citizen with expertise in the matters at hand, and have taken time off from work because I must in good conscience add my voice to try to help this committee understand how I believe you may best be able to solve the issues regarding use of pesticides on school grounds.

Although the intent of the original legislation may have been to protect children from risks associated with exposure to pesticides, it actually had negative impacts on health risks to children. In a conversation with Kevin Salters of Tick-Be-Gone Company a few weeks ago, I discovered that through all of last year, his company refused to treat day care properties because the law then required prior approval of treatment by local health authorities. Children were going home from untreated properties with attached black-legged ticks, the vectors for three human diseases. During last year's legislative session, the pesticide ban law was changed to permit day care licensees to "call the shots" on determining whether pesticides should be applied. I have alerted Kevin of this change in the law, so now, at least, children at day cares can be protected from disease vectors.

This example points out the unintended consequences of the pesticide ban law. There are currently no effective non-pesticidal options that will protect athletic fields from white grub damage. If the quality of athletic turf declines, kids will either not be permitted to play sports on hazardous fields, or they may be exposed to additional risk of injury from playing on surfaces that are in poor condition. Managers of these facilities are understandably concerned because they soon will not be able to properly care for these athletic fields.

There is a problem with Federal law and present pesticide labels with respect to potential exposure of children to residues. Without any state regulation, the Federally mandated reentry interval for any products used in a landscape setting is the time required for the residues to dry. The same product used in agriculture will always have at least a 4 hour reentry interval. Some products used on school grounds have an agricultural reentry interval of 24 hours. It is reasonable to think that school children should have greater protection from exposure to pesticide residues than agricultural workers.

Organic advocates continue to push for organic standards to be applied, without regard to evidence that, contrary to their beliefs, "organic" or "natural" classification has no correlation to human safety. I can find glaring examples of organic pesticides that contain possible carcinogens, for example, and yet are touted as being "safe" by organic advocates. Organic advocates will profit from the pesticide ban from school grounds by selling services that are untested for effectiveness and are very expensive.

The best way to determine toxicity to humans for pesticides is through the science of toxicology. The U.S. EPA rates pesticides in 4 categories due principally to their hazard through human exposure. I believe that, if only Category 3 or 4 pesticides were allowed to be used on school grounds, and a re-entry period of twice the duration for the same active ingredient used in agricultural crops were established, then only the products of lowest human toxicity would be used, and the Federal reentry loophole would be closed. The advantages of this approach are: (1) the objective of the pesticide ban, to safeguard the health of children, will not be compromised, (2) tools will be available for managing pests that otherwise could cause considerable losses to towns, and (3) Connecticut could become the leader for a reasoned and science-based approach to this conflict.